

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE: Tommie E. King, Jr.

*Debtor(s),*

Chapter 7

Case No. 16-39010

Judge Pamela S. Hollis

**NOTICE OF MOTION**

TO: SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE THAT ON January 12, 2017 at 10:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Pamela S. Hollis, U.S. Bankruptcy Judge, 219 S. Dearborn Street, Chicago, Illinois, room 644, and shall then and there present the attached Motion and at which time you may appear if you so desire.

**CERTIFICATION**

I, the undersigned Attorney, Certify that I served a copy of this Notice to the Addresses attached by electronic notice through ECF or by depositing the same at the U.S. Mail at 1 North Dearborn, Chicago, Illinois 60602 at 5:00 P.M. on December 29, 2016, with proper postage prepaid.

McCalla Raymer Pierce, LLC  
/s/ Toni Townsend  
Toni Townsend  
ARDC# 6289370  
1 N. Dearborn St. Suite 1300  
Chicago, IL 60602  
(312) 346-9088

**Pierce & Associates, P.C. and McCalla Raymer, LLC combined Firms to form the Firm  
McCalla Raymer Pierce, LLC.**

**This is an attempt to collect a debt and any information obtained will be used for that  
purpose.**

Pierce File No. 255725-98388

**NOTICE OF MOTION ADDRESSES**

To Trustee:

Allan J. DeMars

Spiegel & DeMars

19 S. LaSalle St., Suite 902

Chicago, IL 60603

**by Electronic Notice through ECF**

To Debtor:

Tommie E. King

7717 S. Christiana Ave.

Chicago, IL 60652

**by U.S. Mail**

10361 S. Wood St.

Chicago, IL 60643

**by U.S. Mail**

To Attorney:

Erica Crohn Minchella

7538 St. Louis Ave.

Skokie, IL 60076

**by Electronic Notice through ECF**

McCalla Raymer Pierce, LLC

Attorney For: Creditor

1 N. Dearborn St. Suite 1300

Chicago, IL 60602

(312) 346-9088

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**MOTION TO CONFIRM ABSENCE OF AUTOMATIC STAY**

NOW COMES JPMorgan Chase Bank, National Association, by and through its attorney, McCalla Raymer Pierce, LLC, and in support of its Motion to Confirm Absence of Automatic Stay, stating as follows:

1. On December 11, 2016, the above captioned Chapter 13 was filed.
2. JPMorgan Chase Bank, National Association services the first mortgage lien on the property located at 7717 S. Christiana Ave., Chicago, IL 60652.
3. The instant case represents the third filing by the Debtor within one year where the prior two cases were dismissed.
4. The Debtor's first case, 15-15640, was filed on May 1, 2015, and dismissed on the Trustee's motion on February 11, 2016.
5. The Debtor then filed case number 16-09985 on March 23, 2016. This case was dismissed on the Trustee's motion on August 18, 2016.
6. Neither previous case was dismissed pursuant to 11 U.S.C. Section 707 (b).
7. Accordingly, pursuant to 11 U.S.C. Section 362 (c)(4), the filing of this case did not impose an Automatic Stay. 11 U.S.C. Section 362 (c)(4).

WHEREFORE, YOUR MOVANT respectfully prays that this Court enter an Order confirming, pursuant to 11 U.S.C. Section 362 (c)(4), the automatic stay was not imposed by the filing of the instant case, and leave be granted to JPMorgan Chase Bank, National Association to proceed with foreclosure and eviction of the property located at 7717 S. Christiana Ave., Chicago, IL 60652, and for such other and further relief as this Honorable Court deems just.

Respectfully Submitted,  
JPMorgan Chase Bank, National  
Association

/s/ Toni Townsend  
Toni Townsend  
ARDC# 6289370

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Chicago, IL 60602  
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